

FILED

UNITED STATES DISTRICT COURT

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SOUTHERN DISTRICT OF CALIFORNIA

BY RNT DEPUTY

ARREST ON OUT-OF-DISTRICT OFFENSE

CASE NUMBER: '08 MJ 0478

The person charged as CASTANEDA, Omar Rivera now appears before this United States District Court for an initial appearance as a result of the following charges having been filed in the United States District Court for the Central District of California on 08/16/07 with: Title 21, 18 USC 846 (a)(1) & 841(b)(1) in violation

of:

**Conspiracy to Distribute Cocaine and Methamphetamine;
Conspiracy to Launder Money;
Money Laundering**

The charging documents and the warrant for the arrest of the defendant which was issued by the above United States District Court are attached hereto.

I hereby swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

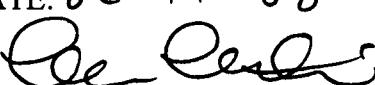
DATED: 02/19/08



Brian Caserta
CI - Deputy United States Marshal

Reviewed and Approved

DATE: 02-19-08



Assistant United States Attorney

MAGISTRATE JUDGE INFORMATION SHEET**MAGISTRATE CASE NUMBER:**

1. Hearing Date _____	2. AUSA _____	3. Mag Judge _____
4. USAO # _____	5. Agency # _____	
6. Defendant #: _____ of _____	7. Case Agent _____	
8. Charges: Title 21: 18 USC 846,841(a)(1)		
9. Defendant's Name: CASTANEDA, Omar Rivera		10. Social Security #: unknown
11. Alias: _____		12. Birth Date: 11/26/69
13. Address: 401 E. 12 th Street #23, Los Angeles, CA		
14. Arrest Date: 02/17/08		15. Place of Arrest: San Ysidro POE
16. Date Committed: 02/17/08		
17. Agent(s): CI-DUSM Paul Beal		18. Office Phone #: (619) 557-7482
19. Agency: U.S. Marshals Service		20. Station: San Diego, CA
21. Custody: xYes	No	
22. Citizenship: U.S.	Mex	Other
23. INS Status: Res <input type="checkbox"/>	BCC <input type="checkbox"/>	Other <input type="checkbox"/>
24. Prior Deports: _____		25. IDENT Hits: _____
26. Prior Record: •		
27. Drug Usage: _____ How Evidenced? _____		
28. Cash on Defendant: _____ 29. Other Evidence: _____		
30. Agent Fact Summary: • CASTANEDA was arrested on 02/17/08, by Deputy Beal. He was taken into custody @ San Ysidro POE on 02/17/08, on Out-of-District Indictment W#CR 07-00818 issued 08/16/07, out of Los Angeles, CA.		
31. Agent's info re: Defendant (Employment, Family, etc.)		
32. Def Attorney: Appointed <input type="checkbox"/> Retained <input type="checkbox"/>		
33. DEFENSE ATTORNEY: _____		PHONE NUMBER: _____
34. Next Date for: PH Removal Date _____ Time _____		Detention Date _____ Time _____
35. Bond Set: _____		
36. Material Witness Custodial Status: Custody		Not in Custody
37. MATERIAL WITNESS ATTORNEY: _____		PHONE NUMBER: _____
Court's Orders/Motions		Government's Notes for Bail
_____ _____ _____		

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

United States of America

v.
OMAR RIVERA CASTANEDA

Plaintiff(s)

CASE NUMBER

CR 07-00818

Defendant(s)

**WARRANT FOR ARREST
UNDER SEAL**

TO: UNITED STATES MARSHAL AND ANY AUTHORIZED UNITED STATES OFFICER

YOU ARE HEREBY COMMANDED to arrest OMAR RIVERA CASTANEDAand bring him/her forthwith to the nearest Magistrate Judge to answer a(n): Complaint Indictment
 Information Order of Court Probation Violation Petition Violation Notice
 charging him/her with: (ENTER DESCRIPTION OF OFFENSE BELOW)Conspiracy to Distribute Cocaine and MethamphetamineConspiracy to Launder Money; Money Laundering

in violation of Title 21:18: United States Code;

Section(s) 846, 841(a)(1), 841(b)(1)(A):1956(h), 1956(a)(2):1956(a)(2):Sherri R. Carter
NAME OF ISSUING OFFICER

AUGUST 16, 2007 LOS ANGELES, CALIFORNIA

Clerk of Court
TITLE OF ISSUING OFFICER

DATE AND LOCATION OF ISSUANCE

JANET AGBHOLAGHI
SIGNATURE OF DEPUTY CLERKBY: ANDREW J. WISTRICH
NAME OF JUDICIAL OFFICER**RETURN**

THIS WARRANT WAS RECEIVED AND EXECUTED WITH THE ARREST OF THE ABOVE-NAMED DEFENDANT AT (LOCATION)

DATE RECEIVED

NAME OF ARRESTING OFFICER

DATE OF ARREST

TITLE

DESCRIPTIVE INFORMATION FOR DEFENDANT
CONTAINED ON PAGE TWO

SIGNATURE OF ARRESTING OFFICER

WARRANT FOR ARREST

CR-12 (07/04)

PAGE 1 OF 2

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

United States of America v. OMAR RIVERA CASTANEDA	CASE NUMBER: CR WARRANT FOR ARREST UNDER SEAL
Plaintiff(s) Defendant(s)	

ADDITIONAL DEFENDANT INFORMATION

RACE:	SEX:	HEIGHT:	WEIGHT:	HAIR:	EYES:	OTHER:		
DATE OF BIRTH:	PLACE OF BIRTH:			SOCIAL SECURITY NO.		DRIVER'S LICENSE NO.	ISSUING STATE	
ALIASES:		SCARS, TATTOOS OR OTHER DISTINGUISHING MARKS:						
AUTO YEAR:	AUTO MAKE:	AUTO MODEL:		AUTO COLOR:		AUTO LICENSE NO.	ISSUING STATE	
LAST KNOWN RESIDENCE:			LAST KNOWN EMPLOYMENT:					
FBI NUMBER:								
ADDITIONAL INFORMATION:								
ADDITIONAL DEFENDANT INFORMATION								

INVESTIGATIVE AGENCY NAME:	INVESTIGATIVE AGENCY ADDRESS:
NOTES:	

WARRANT FOR ARREST

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FILED

2007 AUG 17 PM 12:08

COURT CLERK'S OFFICE
U.S. DISTRICT COURT
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2007 Grand Jury

UNITED STATES OF AMERICA,) CR 07- 07-00818

Plaintiff,) I N D I C T M E N T

v.)

JORGE SERRANO PAYAN,) [21 U.S.C. §§ 846, 841(a)(1),
aka "the Doctor,") 841(b)(1)(A) : Conspiracy to
JOSEPH GALAVIZ LANGER,) Distribute Cocaine and
MARICELA LANGER,) Methamphetamine; 21 U.S.C.
GONZALO GALAVIZ,) §§ 841(a)(1), 841(b)(1)(A),
VANESSA GALAVIZ,) 841(b)(1)(B) : Possession with
OMAR BELTRAN,) Intent to Distribute Cocaine;
FRANCISCO BELTRAN,) 21 U.S.C. § 843(b) : Use of a
FERNANDO BENITEZ GASTELUM,) Communication Facility In
JOSE BENITEZ GASTELUM,) Committing a Felony Drug
HUMBERTO LANDELL-RUELAS,) Offense; 18 U.S.C. §§ 1956(h),
aka "Beto,") 1956(a)(2) : Conspiracy to
ANTONIO BARBA, JR.,) Launder Money; 18 U.S.C.
MARCOS VELASQUEZ-CASTRO,) § 1956(a)(2) : Money Laundering]
ALBERTO DAVID RUBIO ZAMORA,)

aka "El Mudo,")
OMAR RIVERA CASTANEDA,)
JOSE RAMON GARCIA, and)
JESUS AGUILAR,)
aka "Jesse Zamora,")

Defendants.)

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CB
CB:cb

TJS

1 The Grand Jury charges:

COUNT ONE

[21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown, and continuing to on or about
August 16, 2007, in Los Angeles, Riverside and San Bernardino
Counties, within the Central District of California and
elsewhere, defendants JORGE SERRANO PAYAN, also known as ("aka")
"El Doctor" ("PAYAN"), JOSEPH GALAVIZ LANGER ("J. LANGER"),
MARICELA LANGER ("M. LANGER"), GONZALO GALAVIZ ("G. GALAVIZ"),
VANESSA GALAVIZ ("V. GALAVIZ"), OMAR BELTRAN ("O. BELTRAN"),
FRANCISCO BELTRAN ("F. BELTRAN"), FERNANDO BENITEZ GASTELUM ("F.
BENITEZ"), JOSE BENITEZ GASTELUM ("J. BENITEZ"), HUMBERTO
LANDELL-RUELAS, aka "Beto" ("LANDELL-RUELAS"), ANTONIO BARBA, JR.
("BARBA"); MARCOS VELASQUEZ-CASTRO ("VELASQUEZ-CASTRO"), ALBERTO
DAVID RUBIO ZAMORA, aka El Mudo ("ZAMORA"), OMAR RIVERA CASTANEDA
("CASTANEDA"), JOSE RAMON GARCIA ("GARCIA"), JESUS AGUILAR, aka
"Jesse Zamora" ("AGUILAR"), and others known and unknown to the
Grand Jury, knowingly and intentionally conspired and agreed with
each other to:

21 1. Distribute more than 5 kilograms of a mixture or
22 substance containing a detectable amount of cocaine, a schedule
23 II narcotic drug controlled substance, in violation of Title 21,
24 United States Code, Sections 841(a)(1) and 841(b)(1)(A);

25 //

26 | //

27 //

28 | //

1 2. Distribute more than 500 grams of a mixture or substance
2 containing a detectable amount of methamphetamine or more than 50
3 grams of actual methamphetamine, a schedule II narcotic drug
4 controlled substance, in violation of Title 21, United States
5 Code, Sections 841(a)(1) and 841(b)(1)(A).

6 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
7 ACCOMPLISHED

8 The objects of the conspiracy were to be accomplished in
9 substance as follows:

10 1. PAYAN directed J. LANGER, M. LANGER, and G. GALAVIZ to
11 receive and maintain shipments of cocaine for distribution.

12 2. PAYAN directed J. LANGER and M. LANGER to distribute the
13 cocaine to O. BELTRAN, F. BELTRAN, F. BENITEZ, J. BENITEZ,
14 LANDELL-RUELAS, BARBA, VELASQUEZ-CASTRO, GARCIA, AGUILAR and
15 others for distribution.

16 3. J. LANGER, M. LANGER, G. GALAVIZ, V. GALAVIZ and others
17 maintained cocaine, proceeds from the sale of cocaine, and other
18 items related to their illegal cocaine distribution, at their
19 residences.

20 4. J. LANGER, M. LANGER, G. GALAVIZ, V. GALAVIZ, ZAMORA and
21 others transported drug proceeds derived from the sale of cocaine
22 in the United States and delivered those proceeds to PAYAN and
23 others in Mexico.

24 5. M. LANGER and V. LANGER coordinated information
25 regarding arrests of organization members in order to aid
26 organization members' efforts to thwart detection by law
27 enforcement.

28 ///

1 C. OVERT ACTS

2 In furtherance of the conspiracy, and to accomplish the
3 objects of the conspiracy, PAYAN, J. LANGER, M. LANGER, G.
4 GALAVIZ, V. GALAVIZ, O. BELTRAN, F. BELTRAN, F. BENITEZ, J.
5 BENITEZ, LANDELL-RUELAS, BARBA, VELASQUEZ-CASTRO, ZAMORA,
6 CASTANEDA, GARCIA, AGUILAR and others known and unknown to the
7 Grand Jury, committed various overt acts, on or about the
8 following times and dates, within the Central District of
9 California, and elsewhere, including but not limited to the
10 following:

11 1. On October 31, 2005, J. LANGER transported approximately
12 \$56,727 of drug proceeds from his residence in Lake Elsinore,
13 California to the United States-Mexico border.

14 2. On February 11, 2006, by telephone using coded language,
15 PAYAN directed J. LANGER to retrieve \$24,000 in drug proceeds
16 from GARCIA.

17 3. On February 13, 2006, by telephone using coded language,
18 J. LANGER arranged to meet GARCIA in the parking lot of an AM/PM
19 convenience store in Fontana, California in order to collect drug
20 proceeds from GARCIA.

21 4. On February 13, 2006, J. LANGER met with GARCIA at the
22 AM/PM convenience store in Fontana, California and retrieved
23 \$24,000 in drug proceeds from GARCIA.

24 5. On February 16, 2006, J. LANGER drove a rented car to a
25 Chevron gas station in Lake Elsinore, California and met with an
26 unidentified co-conspirator, who was driving a tan Ford
27 Expedition, and the two then drove in tandem back to J. LANGER's
28 residence in Lake Elsinore, California.

1 6. On February 16, 2006, by telephone using coded language,
2 J. LANGER told PAYAN that the deal had been completed and J.
3 LANGER had received 36 kilograms of cocaine.

4 7. On February 16, 2006, by telephone using coded language,
5 PAYAN directed J. LANGER to retrieve drug proceeds from J.
6 LANGER's residence and then meet with PAYAN at a Burger King
7 restaurant in order to deliver the drug proceeds to PAYAN.

8 8. On February 16, 2006, by telephone using coded language,
9 J. LANGER advised PAYAN that J. LANGER, M. LANGER and V. GALAVIZ
10 were at a Staples store in Norco, California and were prepared to
11 deliver drug proceeds to PAYAN.

12 9. On February 16, 2006, J. LANGER met with PAYAN at a
13 Staples store parking lot in Norco, California and delivered
14 several cellophane-wrapped bundles which contained approximately
15 \$187,971 in United States currency to PAYAN.

16 10. On February 16, 2006, by telephone using coded
17 language, J. LANGER told GARCIA that J. LANGER had been directed
18 to deliver six kilograms of cocaine to GARCIA, and J. LANGER
19 asked GARCIA to meet at the parking lot of a McDonald's
20 restaurant.

21 11. On February 16, 2006, by telephone using coded
22 language, J. LANGER directed GARCIA to meet J. LANGER at a Del
23 Taco restaurant, because J. LANGER had observed law enforcement
24 officers present at the McDonald's parking lot.

25 12. On February 16, 2006, by telephone, M. LANGER advised
26 GARCIA that J. LANGER was present at the meeting location and was
27 in the restroom.

28 13. On February 16, 2006, by telephone using coded

1 language, J. LANGER advised PAYAN that J. LANGER had completed
2 the delivery to GARCIA.

3 14. On August 15, 2006, by telephone using coded language,
4 PAYAN and J. LANGER discussed GALAVIZ joining the conspiracy, and
5 J. LANGER advised PAYAN that GALAVIZ would not be permitted to
6 cooperate with law enforcement if he were apprehended and that he
7 would have to accept any punishment imposed on him because co-
8 conspirators would be obligated to provide for his family.

9 15. On August 16, 2006, by telephone using coded language,
10 J. LANGER told PAYAN that G. GALAVIZ had agreed to transport
11 narcotics, provided that co-conspirators would attempt to
12 identify "check points" at the border between the United States
13 and Mexico, in order to prevent G. GALAVIZ from being stopped and
14 identified by law enforcement.

15 16. On August 16, 2006, by telephone using coded language,
16 J. LANGER told PAYAN that J. LANGER had advised G. GALAVIZ that
17 G. GALAVIZ would be provided with a car that would have hidden
18 compartments installed for him to use in the shipment of cocaine.

19 17. On August 16, 2006, by telephone using coded language,
20 J. LANGER advised PAYAN that J. LANGER or M. LANGER could travel
21 to Mexico with a newly-recruited drug courier, and PAYAN answered
22 that PAYAN would make arrangements for a shipment of cocaine in
23 Mexico.

24 18. On August 17, 2006, by telephone using coded language,
25 PAYAN advised J. LANGER that PAYAN was going to need J. LANGER
26 that day, because PAYAN was expecting a shipment of cocaine to be
27 delivered that night.

28 19. On August 17, 2006, by telephone using coded language,

1 PAYAN directed J. LANGER to take drug proceeds to an unidentified
2 co-conspirator in Mexicali, Mexico and have G. GALAVIZ follow him
3 in G. GALAVIZ' vehicle to determine if a hidden compartment could
4 be installed in G. GALAVIZ' vehicle.

5 20. On August 18, 2006, by telephone using coded language,
6 J. LANGER directed an unidentified co-conspirator to meet J.
7 LANGER in the parking lot near an El Pollo Loco restaurant in
8 Lake Elsinore, California in order to deliver 46 kilograms of
9 cocaine.

10 21. On August 18, 2006, J. LANGER met with an unidentified
11 co-conspirator near the El Pollo Loco restaurant and then drove
12 in tandem with the unidentified co-conspirator to J. LANGER's
13 residence on McKinley Drive in Lake Elsinore, California.

14 22. On August 18, 2006, by telephone using coded language,
15 PAYAN advised J. LANGER that he should have received 46 kilograms
16 of cocaine and that only a few of the kilograms would have been
17 damaged in the shipment.

18 23. On August 18, 2006, by telephone using coded language,
19 J. LANGER advised PAYAN that 46 kilograms of cocaine had been
20 delivered, and J. LANGER advised PAYAN that he believed F.
21 BELTRAN might purchase the kilograms of cocaine.

22 24. On August 19, 2006, by telephone using coded language,
23 PAYAN advised J. LANGER to meet O. BELTRAN and F. BELTRAN in
24 order to deliver cocaine to them, and they identified a location
25 near the intersection of the 210 and 5 freeways.

26 25. On August 19, 2006, by telephone using coded language,
27 O. BELTRAN directed J. LANGER to the location where he and F.
28 BELTRAN intended to meet and take delivery of approximately 29

1 kilograms of cocaine from J. LANGER

2 26. On August 19, 2006, by telephone using coded language,
3 J. LANGER advised PAYAN that O. BELTRAN had given J. LANGER
4 directions to the meeting location and that J. LANGER was driving
5 on the 210 freeway towards Interstate 5, in order to deliver
6 cocaine, as directed by PAYAN.

7 27. On August 19, 2006, J. LANGER drove to a Ralph's
8 grocery store parking lot in Mission Hills, California and
9 delivered approximately 29 kilograms of cocaine to O. BELTRAN and
10 F. BELTRAN.

11 28. On August 19, 2006, O. BELTRAN drove from the Ralph's
12 grocery store parking lot in Mission Hills, California with F.
13 BELTRAN and approximately 29 kilograms of cocaine and conducted
14 counter-surveillance driving techniques, in order to identify the
15 possible presence of law enforcement officers in the area.

16 29. On September 20, 2006, by telephone using coded
17 language, J. LANGER told PAYAN that F. BENITEZ had inspected
18 cocaine and had taken 10 kilograms, and PAYAN directed J. LANGER
19 to call ZAMORA.

20 30. On September 20, 2006, by telephone using coded
21 language, PAYAN directed J. LANGER to deliver 10 kilograms of
22 cocaine to LANDELL-RUELAS.

23 31. On September 20, 2006, by telephone using coded
24 language, J. LANGER arranged to meet with LANDELL-RUELAS at a
25 Sav-On drugstore parking lot in Diamond Bar, California in order
26 to deliver cocaine to LANDELL-RUELAS.

27 32. On September 20, 2006, J. LANGER drove a gold 2005
28 Dodge Caravan to the Sav-On drugstore parking lot in Diamond Bar,

1 California and delivered approximately 10 kilograms of cocaine to
2 LANDELL-RUELAS.

3 33. On September 22, 2006, by telephone using coded
4 language, F. BENITEZ called J. LANGER two times and told J.
5 LANGER that F. BENITEZ and J. BENITEZ had obtained five kilograms
6 of cocaine from J. LANGER the previous Friday.

7 34. On September 22, 2006, by telephone using coded
8 language, J. BENITEZ told J. LANGER that F. BENITEZ had called
9 previously and would need to speak with J. LANGER to coordinate a
10 cocaine transaction and asked if F. BENITEZ could call J. LANGER.

11 35. On September 22, 2006, by telephone using coded
12 language, J. LANGER told PAYAN that J. BENITEZ and F. BENITEZ had
13 contacted J. LANGER, and PAYAN directed J. LANGER to identify the
14 amount of cocaine that J. BENITEZ and F. BENITEZ wanted to
15 purchase.

16 36. On September 22, 2006, by telephone using coded
17 language, F. BENITEZ told J. LANGER that F. BENITEZ needed only
18 one kilogram of cocaine at that time, and J. LANGER told F.
19 BENITEZ that J. LANGER would speak to PAYAN about the transaction
20 and would meet with F. BENITEZ at an Arco gas station in one
21 hour.

22 37. On September 22, 2006, by telephone using coded
23 language, J. LANGER advised PAYAN that F. BENITEZ wanted one
24 kilogram of cocaine and that J. LANGER had offered to deliver it
25 in one hour, and PAYAN told J. LANGER to take the "best" kilogram
26 of cocaine to F. BENITEZ.

27 38. On September 22, 2006, by telephone using coded
28 language, J. LANGER told F. BENITEZ that J. LANGER would deliver

1 one kilogram of cocaine to F. BENITEZ at a location on Sixth
2 Street, near the Interstate 15 freeway in Norco, California, and
3 that F. BENITEZ should provide payment for the cocaine at the
4 same time.

5 39. On September 22, 2006, J. LANGER drove a Jeep Cherokee
6 to a Sizzler parking lot near Interstate 15 in Riverside County
7 and delivered cocaine to F. BENITEZ.

8 40. On September 22, 2006, by telephone using coded
9 language, J. LANGER told PAYAN that J. LANGER met with F.
10 BENITEZ, delivered cocaine and collected \$12,500 from F. BENITEZ.

11 41. On October 12, 2006, by telephone using coded language,
12 PAYAN directed J. LANGER to retrieve drug proceeds from LANDELL-
13 RUELAS and to await further directions from PAYAN.

14 42. On October 12, 2006, LANDELL-RUELAS and BARBA drove a
15 Chrysler convertible sedan to the San Gabriel Tacos restaurant in
16 Baldwin Park, California and delivered approximately 13 kilograms
17 of cocaine to VELASQUEZ-CASTRO and an unindicted co-conspirator.

18 43. On October 16, 2006, by telephone using coded language,
19 J. LANGER directed an unidentified co-conspirator to meet J.
20 LANGER in the parking lot of an El Pollo Loco restaurant in Lake
21 Elsinore, California, so that J. LANGER could deliver \$20,000 in
22 drug proceeds to an unidentified co-conspirator, as J. LANGER had
23 been directed to do by PAYAN.

24 44. On October 16, 2006, an unidentified co-conspirator
25 drove a black car, bearing Mexican license plates to the El Pollo
26 Loco parking lot in Lake Elsinore, California and met with J.
27 LANGER.

28 45. On October 17, 2006, at approximately 1:00 p.m., by

1 telephone using coded language, PAYAN advised J. LANGER that an
2 unindicted co-conspirator would deliver cocaine to J. LANGER.

3 46. On October 17, 2006, by telephone using coded language,
4 J. LANGER directed an unindicted co-conspirator to meet him at
5 the El Pollo Loco restaurant in Lake Elsinore, California, and
6 the unindicted co-conspirator told J. LANGER that he would be
7 driving a black Mitsubishi Montero.

8 47. On October 17, 2006, by telephone using coded language,
9 J. LANGER told PAYAN that J. LANGER was en route to receive the
10 car which was transporting the load of cocaine, and PAYAN told J.
11 LANGER that the driver of the load vehicle might need to take the
12 car to J. LANGER's residence in order to open the hidden
13 compartment and remove the cocaine from the car.

14 48. On October 17, 2006, J. LANGER drove to the El Pollo
15 Loco restaurant in Lake Elsinore, California and met with the
16 driver of a black Mitsubishi Montero, and then drove in tandem
17 with the driver of the Montero towards J. LANGER's residence.

18 49. On October 17, 2006, by telephone using coded language,
19 J. LANGER called PAYAN and advised PAYAN that an unindicted co-
20 conspirator had been stopped by law enforcement officers.

21 50. On October 17, 2006, by telephone using coded language,
22 J. LANGER advised PAYAN that the car driven by an unindicted co-
23 conspirator had been towed by law enforcement officers, and PAYAN
24 directed J. LANGER to "dump" his telephone.

25 51. On October 27, 2006, by telephone using coded language,
26 M. LANGER and GALAVIZ told J. LANGER that M. LANGER had met with
27 the unindicted co-conspirator, and M. LANGER and G. GALAVIZ
28 advised J. LANGER that 14 kilograms of cocaine had been delivered

1 to the residence.

2 52. On November 17, 2006, by telephone using coded
3 language, PAYAN directed J. LANGER to deliver approximately
4 \$415,000 in United States currency to ZAMORA when ZAMORA arrived
5 at J. LANGER's residence.

6 53. On November 17, 2006, by telephone using coded
7 language, J. LANGER advised PAYAN that J. LANGER had counted the
8 money to deliver to ZAMORA and reported that the entire amount
9 was ready, except for \$175, and J. LANGER and PAYAN agreed that
10 the payment should be \$415,000.

11 54. On November 17, 2006, ZAMORA drove a red Mustang
12 convertible to J. LANGER's residence in order to take delivery of
13 approximately \$415,000 in United States currency, which
14 represented the proceeds of illegal drug sales.

15 55. On November 17, 2006, by telephone using coded
16 language, J. LANGER advised M. LANGER that J. LANGER was going to
17 need to drive with ZAMORA the next day to deliver drug proceeds.

18 56. On November 18, 2006, ZAMORA and CASTANEDA drove to the
19 residence of J. LANGER in Lake Elsinore, California, and
20 CASTANEDA drove from the residence with approximately \$405,150 of
21 illegal drug proceeds in the form of United States currency.

22 57. On December 18, 2006, F. BENITEZ and J. BENITEZ
23 directed an unindicted co-conspirator to transport approximately
24 1.35 kilograms of methamphetamine from Pomona, California and
25 distribute the methamphetamine in Kansas City, Missouri.

26 58. On March 7, 2007, by telephone using coded language,
27 PAYAN directed J. LANGER to pack bundles of United States
28 currency for J. LANGER to deliver to an unidentified co-

1 conspirator.

2 59. On March 8, 2007, J. LANGER and G. GALAVIZ met with
3 PAYAN in Mexicali, Mexico.

4 60. On March 11, 2007, by telephone using coded language,
5 G. GALAVIZ told J. LANGER that ZAMORA had asked G. GALAVIZ to
6 store 30 kilograms of cocaine for ZAMORA, and J. LANGER told G.
7 GALAVIZ to charge ZAMORA a fee for storing the cocaine.

8 61. On March 11, 2007, by telephone, G. GALAVIZ told J.
9 LANGER that G. GALAVIZ had told ZAMORA that G. GALAVIZ worked for
10 PAYAN, in the same way that J. LANGER worked for PAYAN, and M.
11 LANGER told G. GALAVIZ that G. GALAVIZ should tell ZAMORA not to
12 call on G. GALAVIZ' personal telephone.

13 62. On March 13, 2007, by telephone using coded language,
14 PAYAN directed J. LANGER to transport drug proceeds to Mexico.

15 63. On March 14, 2007, by telephone using coded language,
16 M. LANGER directed G. GALAVIZ to be ready to travel with J.
17 LANGER to Mexico in order to deliver drug proceeds, and that G.
18 GALAVIZ should bring luggage in order to deter possible attention
19 from law enforcement.

20 64.. On March 14, 2007, by telephone using coded language,
21 M. LANGER advised G. GALAVIZ that J. LANGER was en route and had
22 struggled to fit the currency into the load car, and M. LANGER
23 also advised that she and J. LANGER had previously driven to
24 Mexico at 70 miles per hour and had not encountered any
25 difficulties from law enforcement.

26 65. On March 14, 2007, J. LANGER and G. GALAVIZ attempted
27 to transport approximately \$267,770 in United States currency to
28 Mexico by hiding the money in the rear quarter panels of a Dodge

1 van and driving the van to Mexico.

2 66. On March 14, 2007, by telephone using coded language,
3 J. LANGER advised M. LANGER that J. LANGER and G. GALAVIZ had
4 been stopped by law enforcement officers near the United States-
5 Mexico border.

6 67. On March 14, 2007, by telephone using coded language,
7 V. GALAVIZ advised M. LANGER that J. LANGER and G. GALAVIZ had
8 been stopped and that officers searched the Dodge van but had not
9 found the hidden currency.

10 68. On March 14, 2007, by telephone using coded language,
11 M. LANGER asked V. GALAVIZ to send an unidentified co-conspirator
12 to M. LANGER's residence in order to remove the kilograms of
13 cocaine that had been stored at the residence so that the cocaine
14 would not be found by law enforcement after the search of the
15 Dodge van, and V. GALAVIZ told M. LANGER that G. GALAVIZ was
16 planning to hide contraband at the residence, in anticipation
17 that law enforcement officers would also search GALAVIZ'
18 residence.

19 69. On March 14, 2007, by telephone using coded language,
20 M. LANGER and V. GALAVIZ discussed plans to use J. LANGER's Jeep
21 Cherokee to move kilograms of cocaine from M. LANGER's home to V.
22 GALAVIZ' home, and V. GALAVIZ provided driving directions to M.
23 LANGER, including warnings about the route to take in order to
24 avoid contact with law enforcement.

25 70. On March 14, 2007, by telephone, V. GALAVIZ told M.
26 LANGER that the unidentified co-conspirator would arrive at M.
27 LANGER's residence in about half-an-hour in order to move cocaine
28 out of the residence.

1 71. On March 14, 2007, by telephone using coded language,
2 M. LANGER told V. GALAVIZ that V. GALAVIZ would have to handle
3 moving the cocaine from M. LANGER's residence herself and that V.
4 GALAVIZ should direct an unidentified co-conspirator to remove
5 items from the residence.

6 72. On March 14, 2007, V. GALAVIZ and an unidentified co-
7 conspirator drove to the residence of J. LANGER and M. LANGER in
8 Lake Elsinore, California and removed items from the residence in
9 order to prevent them from being found by law enforcement
10 officers in a search of the residence.

11 73. On March 14, 2007, by telephone using coded language,
12 M. LANGER advised PAYAN that law enforcement officers were using
13 police dogs to search their car, but that the currency had been
14 hidden well in the car, as always.

15 74. On March 14, 2007, V. GALAVIZ advised M. LANGER that
16 law enforcement officers had located the \$267,770 that they had
17 hidden in the Dodge van.

18 75. On March 14, 2007, M. LANGER provided false
19 explanations to V. GALAVIZ to explain the presence of the drug
20 proceeds and told V. GALAVIZ not to let anyone into her residence
21 voluntarily.

22 76. On March 14, 2007, by telephone using coded language,
23 J. LANGER advised M. LANGER that J. LANGER and G. GALAVIZ would
24 have to travel to Mexicali, Mexico to explain the seizure of drug
25 proceeds to PAYAN, and M. LANGER stated that she understood what
26 he meant.

27 77. On March 28, 2007, by telephone using coded language,
28 PAYAN directed J. LANGER to distribute three kilograms of cocaine

1 to AGUILAR.

2 78. On March 28, 2007, by telephone using coded language,
3 J. LANGER arranged to meet with an unidentified co-conspirator
4 near the Interstate 10 freeway in Ontario, California, in order
5 to deliver cocaine to AGUILAR.

6 79. On March 28, 2007, J. LANGER and M. LANGER drove a Jeep
7 Cherokee to a residence in Ontario, California and delivered
8 approximately three kilograms of cocaine to AGUILAR.

9 80. On March 28, 2007, AGUILAR possessed approximately 2.87
10 kilograms of cocaine at his residence in Ontario, California.

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1 COUNT TWO
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)]
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4 On or about August 19, 2006, in Los Angeles County, within
5 the Central District of California, defendants JORGE SERRANO
6 PAYAN, also known as "the Doctor," and JOSEPH GALAVIZ LANGER
7 knowingly and intentionally distributed more than 5 kilograms,
8 that is, approximately 28.79 kilograms, of a mixture or substance
9 containing a detectable amount of cocaine, a schedule II narcotic
10 drug controlled substance.
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COUNT THREE

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[21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)]

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On or about August 19, 2006, in Los Angeles County, within
the Central District of California, defendants OMAR BELTRAN and
FRANCISCO BELTRAN knowingly and intentionally possessed with the
intent to distribute more than 5 kilograms, that is,
approximately 28.79 kilograms, of a mixture or substance
containing a detectable amount of cocaine, a schedule II narcotic
drug controlled substance.

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COUNT FOUR

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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)]

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On or about October 12, 2006, in Los Angeles County, within
the Central District of California, defendants HUMBERTO LANDELL-
RUELAS, also known as "Beto," and ANTONIO BARBA, JR., knowingly
and intentionally distributed more than 5 kilograms, that is,
approximately 12.97 kilograms, of a mixture or substance
containing a detectable amount of cocaine, a schedule II narcotic
drug controlled substance.

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1 COUNT FIVE

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)]

3 On or about October 12, 2006, in Los Angeles County, within
4 the Central District of California, defendant MARCOS VELASQUEZ-
5 CASTRO knowingly and intentionally possessed with the intent to
6 distribute more than 5 kilograms, that is, approximately 12.97
7 kilograms, of a mixture or substance containing a detectable
8 amount of cocaine, a schedule II narcotic drug controlled
9 substance.

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1 COUNT SIX

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)]

3 On or about December 18, 2007, in San Bernardino County,
4 within the Central District of California, defendants JOSE
5 BENITEZ GASTELUM and FRANCISCO BENITEZ GASTELUM knowingly and
6 intentionally distributed more than 500 grams, that is,
7 approximately 1.35 kilograms, of a mixture or substance
8 containing a detectable amount of methamphetamine, a schedule II
9 controlled substance.

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1 COUNT SEVEN

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)]

3 On or about March 28, 2007, in San Bernardino County, within
4 the Central District of California, defendants JORGE SERRANO
5 PAYAN, also known as "the Doctor," JOSEPH GALAVIZ LANGER, and
6 MARICELA LANGER knowingly and intentionally distributed more than
7 500 grams, that is, approximately 2.87 kilograms, of a mixture or
8 substance containing a detectable amount of cocaine, a schedule
9 II narcotic drug controlled substance.

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COUNT EIGHT

[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)]

3 On or about March 28, 2007, in San Bernardino County, within
4 the Central District of California, defendant JESUS AGUILAR, also
5 known as "Jesse Zamora," knowingly and intentionally possessed
6 with the intent to distribute more than 500 grams, that is,
7 approximately 2.87 kilograms, of a mixture or substance
8 containing a detectable amount of cocaine, a schedule II narcotic
9 drug controlled substance.

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1 COUNT NINE
2 [21 U.S.C. § 843(b)]

3 On or about March 14, 2007, in Los Angeles County, within
4 the Central District of California, defendants MARICELA LANGER
5 and VANESSA GALAVIZ knowingly and intentionally used a
6 communication facility, to wit, a telephone, in committing and
7 causing and facilitating the commission of a felony drug offense,
8 namely, conspiracy to possess with intent to distribute and the
9 distribution of more than 5 kilograms of a mixture or substance
10 containing a detectable amount of cocaine, a schedule II narcotic
11 drug controlled substance, a violation of 21 U.S.C. § 846.

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1 COUNT TEN

2 [18 U.S.C. §§ 1956(h), 1956(a)(2)]

3 A. OBJECT OF THE CONSPIRACY

4 Beginning on a date unknown and continuing until on or about
5 August 16, 2007, in Los Angeles and San Bernardino Counties,
6 within the Central District of California and elsewhere,
7 defendants JORGE SERRANO PAYAN, also known as "the Doctor"
8 ("PAYAN"), JOSEPH GALAVIZ LANGER ("J. LANGER"), MARICELA LANGER
9 ("M. LANGER"), GONZALO GALAVIZ ("G. GALAVIZ"), VANESSA GALAVIZ
10 ("V. GALAVIZ"), ALBERTO DAVID RUBIO ZAMORA, aka "El Mudo"
11 ("ZAMORA"), OMAR RIVERA CASTANEDA ("CASTANEDA") and others known
12 and unknown to the Grand Jury, knowingly and intentionally
13 conspired and agreed with each other to transport, transmit or
14 transfer and attempt to transport, transmit or transfer monetary
15 instruments or funds from a place in the United States to a place
16 outside the United States, knowing that the monetary instruments
17 or funds represented the proceeds of some form of unlawful
18 activity, and which property was, in fact, the proceeds of
19 specified unlawful activity, that is, conspiracy to distribute
20 cocaine, with the intent to promote the carrying on of said
21 specified unlawful activity, and to conceal and disguise the
22 nature, location, source, ownership, and control the proceeds of
23 said specified unlawful activity, in violation of Title 18,
24 United States Code, Section 1956(a).(2).

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1 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
2 ACCOMPLISHED

3 The object of the conspiracy was to be accomplished in
4 substance as follows:

5 1. The Grand Jury re-alleges and incorporates by reference
6 paragraphs 1 through 6 of Count One setting forth the means
7 described in the conspiracy charged in Count One.

8 2. PAYAN, J. LANGER, M. LANGER and ZAMORA conspired and
9 arranged with others to obtain cocaine.

10 3. PAYAN, J. LANGER, M. LANGER and ZAMORA sold cocaine to
11 others and collected the proceeds from the illegal distribution
12 of cocaine.

13 4. PAYAN, J. LANGER, M. LANGER and ZAMORA directed G.
14 GALAVIZ and CASTANEDA to transport large sums of United States
15 currency to co-conspirators and illegal drug traffickers in
16 Mexico.

17 C. OVERT ACTS

18 In furtherance of the conspiracy, and to accomplish the
19 object of the conspiracy, PAYAN, J. LANGER, M. LANGER, G.
20 GALAVIZ, V. GALAVIZ, ZAMORA, CASTANEDA and others known and
21 unknown to the Grand Jury, committed various overt acts on or
22 about the following dates, within the Central District of
23 California and elsewhere, including but not limited to the
24 following:

25 1. The Grand Jury re-alleges and incorporates by reference
26 paragraphs 1 through 80 of Count One setting forth the overt acts
27 of the conspiracy charged in Count One.

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1 COUNT ELEVEN

2 [18 U.S.C. § 1956(a)(2)]

3 On October 31, 2005, in Los Angeles County, within the
4 Central District of California, JORGE SERRANO PAYAN, also known
5 as "the Doctor," and JOSEPH GALAVIZ LANGER knowingly attempted to
6 transport monetary instruments or funds from a place in the
7 United States to a place outside the United States, knowing that
8 the property involved in the financial transaction represented
9 the proceeds of some form of unlawful activity, and which
10 property was, in fact, the proceeds of specified unlawful
11 activity, that is, conspiracy to distribute controlled
12 substances, in violation of 21 U.S.C. § 846, with the intent to
13 promote the carrying on of the specified unlawful activity, in
14 violation of 18 U.S.C. § 1956(a)(2).

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1 COUNT TWELVE

2 [18 U.S.C. § 1956(a)(2)]

3 On November 18, 2006, in Los Angeles County, within the
4 Central District of California, defendants ALBERTO DAVID RUBIO
5 ZAMORA, also known as "El Mudo," and OMAR RIVERA CASTANEDA
6 knowingly attempted to transport monetary instruments or funds
7 from a place in the United States to a place outside the United
8 States, knowing that the property involved in the financial
9 transaction represented the proceeds of some form of unlawful
10 activity, and which property was, in fact, the proceeds of
11 specified unlawful activity, that is, conspiracy to distribute
12 controlled substances, in violation of 21 U.S.C. § 846, with the
13 intent to promote the carrying on of the specified unlawful
14 activity, in violation of 18 U.S.C. § 1956(a)(2).

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1 COUNT THIRTEEN

2 [18 U.S.C. § 1956(a)(2)]

3 On March 14, 2007, in Los Angeles County, within the Central
4 District of California, defendants JORGE SERRANO PAYAN, also
5 known as "the Doctor," JOSEPH GALAVIZ LANGER, MARICELA LANGER,
6 GONZALO GALAVIZ and VANESSA GALAVIZ knowingly attempted to
7 transport monetary instruments or funds from a place in the
8 United States to a place outside the United States, knowing that
9 the property involved in the financial transaction represented
10 the proceeds of some form of unlawful activity, and which
11 property was, in fact, the proceeds of specified unlawful
12 activity, that is, conspiracy to distribute controlled
13 substances, in violation of 21 U.S.C. § 846, with the intent to
14 promote the carrying on of the specified unlawful activity, in
15 violation of 18 U.S.C. § 1956(a)(2).

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17 A TRUE BILL

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19 151
20 Foreperson

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22 GEORGE S. CARDONA
United States Attorney23 *Wade L. Graham, Deputy Chief, Criminal Division, FOIA*24 THOMAS P. O'BRIEN
Assistant United States Attorney
25 Chief, Criminal Division

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27 CHRISTOPHER BRUNWIN
Assistant United States Attorney
28 OCDETF Section